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U.S. Department of Justice

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

April 20, 2020

By ECF (w/ enclosure)

Honorable Rachel P. Kovner United States District Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Chunn, et al. v. Warden Derek Edge,

Civil Action No. 20-cv-1590 (Kovner, J.) (Mann, M.J.)

Dear Judge Kovner:

Respondent Warden Derek Edge writes to provide a status report to the Court in connection with the Court's Order dated April 16, 2020. Earlier today, Respondent served on Petitioners supplemental responses regarding "soap" and sick-call requests, including 888 pages of sick-call requests. A courtesy copy of Respondent's service letter -- without the extensive document production -- is attached hereto as Exhibit 1.

Respectfully submitted,

RICHARD P. DONOGHUE United States Attorney

By: /s/

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Enclosure

cc: The Honorable Roanne L. Mann, U.S. Magistrate Judge All Counsel of Record (by ECF)

Exhibit 1



U.S. Department of Justice

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

April 20, 2020

By E-mail (w/ enclosures)

Katherine Ruth Rosenfeld Emery Celli Brinckerhoff & Abady LLP 600 Fifth Avenue, 10th Floor New York, New York 10020

Re: Chunn, et al. v. Warden Derek Edge,

Civil Action No. 20-cv-1590 (Kovner, J.) (Mann, M.J.)

Dear Ms. Rosenfeld:

Pursuant to the Court's prior Orders, enclosed please find Respondent's supplemental document production relating to "soap" (Bates numbered BOP 204-236), and sick-call requests submitted electronically from March 13, 2020 to April 13, 2020 (Bates numbered BOP_SCR 1-888).

Very truly yours,

RICHARD P. DONOGHUE United States Attorney

By: /s/

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Enclosures

cc: All Counsel of Record (by email only) (w/ enclosures)